



Eric Gonzalez
District Attorney

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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: TZU CHEUNG

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure #1:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 05/17/2006, AGAINST MOS CHEUNG:
ALLEGATION:

1. DEPARTMENTAL RULES AND VIOLATIONS – MOS/MOS ALTERCATION

CASE STATUS: CLOSED ON 12/01/2006

Disclosure #2:

MOS CHEUNG PLED GUILTY TO THE FOLLOWING NYPD DEPARTMENTAL CHARGES AND SPECIFICATIONS, DATED 10/25/2006:

1. MOS CHEUNG, ON OR ABOUT AND BETWEEN APRIL 3, 2006 AND MAY 10, 2006, WHILE ASSIGNED TO PSA 9, WHILE ON DUTY DID ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY, OR DISCIPLINE OF THE DEPARTMENT, IN THAT SAID OFFICER CHEUNG IMPROPERLY DISPLAYED IN A DEPARTMENT VEHICLE AN IMAGE HE DREW DEPICTING ANOTHER MALE MEMBER OF THE SERVICE ENGAGING IN A SEXUAL ACT WITH HIS MALE PARTNER AND SAID OFFICER CHEUNG WROTE THE WORDS "GAY LOVERS" NEXT TO SAID IMAGE.
2. MOS CHEUNG, ON OR ABOUT AND BETWEEN 4/3/06 AND 6/6/06, ASSIGNED AS INDICATED IN SPECIFICATION# 1, DID ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE DEPARTMENT, IN THAT SAID OFFICER CHEUNG IMPROPERLY DREW THE WORDS "DICK MASICA" ON THE DEPARTMENT LOCKER ASSIGNED TO ANOTHER MEMBER OF THE SERVICE.
3. MOS CHEUNG, ASSIGNED AS INDICATED IN SPECIFICATION #1, TIME, DATE AND LOCATION, DID ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE DEPARTMENT, IN THAT SAID MOS CHEUNG IMPROPERLY DEFACED DEPARTMENT PROPERTY BY WRITING THE WORDS "DICK MASCIA" ON THE DEPARTMENT LOCKER ASSIGNED TO ANOTHER MEMBER OF THE SERVICE.

CASE STATUS: CLOSED ON 03/06/2007

ACTION TAKEN: FOREFEITURE OF FIFTEEN (15) VACATION DAYS

Disclosure #3:

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT:

1. MACEO SCOTT V. CITY OF NEW YORK, ET AL, 12-CV-5301, FILED IN THE EASTERN DISTRICT OF NEW YORK

Disclosure #4:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 11/15/2011, AGAINST MOS CHEUNG:
ALLEGATION:

1. MOS CHEUNG, WHILE ASSIGNED TO P.S.A.#2, AND ON DUTY, DID FAIL TO SAFEGUARD DEPARTMENT ISSUED PROPERTY BY LOSING HIS DEPARTMENT ISSUED MEMOBOOK

CASE STATUS: CLOSED ON 11/18/2011

ACTION TAKEN: SCHEDULE B COMMAND DISCIPLINE, WARNED AND ADMONISHED.

Disclosure #5:

MOS CHEUNG PLED GUILTY TO THE FOLLOWING NYPD DEPARTMENTAL CHARGES AND SPECIFICATIONS, DATED 08/20/2015:

1. MOS CHEUNG, WHILE ASSIGNED TO PSA 2, WHILE OFF-DUTY ON OR ABOUT FEBRUARY 20, 2015, WITHIN THE CONFINES OF KINGS COUNTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, AND EFFICIENCY OF THE DEPARTMENT, TO WIT: SAID POLICE OFFICER INAPPROPRIATELY COMMUNICATED WITH A CRIME VICTIM KNOWN TO THE DEPARTMENT AND VISITED HER RESIDENCE FOR NON-DEPARTMENT PURPOSES.

CASE STATUS: CLOSED ON 01/20/2016

ACTION TAKEN: FORFEITURE OF THIRTY (30) VACATION DAYS

Disclosure #6:

MOS CHEUNG PLED GUILTY TO THE FOLLOWING NYPD DEPARTMENTAL CHARGES AND SPECIFICATIONS, DATED 11/28/2017:

1. MOS CHEUNG, ON OR ABOUT MARCH 16, 2017, WHILE ASSIGNED TO THE 61ST PRECINCT AND ON SICK REPORT, WAS OUTSIDE HIS RESIDENCE WITHOUT PERMISSION OR AUTHORITY FROM THE SICK DESK OR DISTRICT SURGEON.
2. MOS CHEUNG, ON OR ABOUT MARCH 16, 2017, WHILE ASSIGNED TO THE 61ST PRECINCT AND ON SICK REPORT, DID WRONGFULLY ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT IN THAT SAID POLICE OFFICER MADE MISLEADING AND INACCURATE STATEMENTS TO AN NYPD SERGEANT OF THE MEDICAL DIVISION, TO WIT: SAID POLICE OFFICER STATED THAT HE WAS HOME, WHEN HE WAS IN A DIFFERENT COUNTRY, OVER TWO HOURS AWAY FROM HIS RESIDENCE.

CASE STATUS: CLOSED ON 07/17/2018

ACTION TAKEN: SUSPENSION WITHOUT PAY FOR TEN (10) DAYS, FORFEITURE OF TWENTY (20) VACATION DAYS, AND ONE (1) YEAR DISMISSAL PROBATION

Disclosure #7 (PENDING):

[REDACTED]

IN ADDITION, BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH FEBRUARY 2, 2021, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:

Disclosure # 8 (PENDING):

CCRB No. 202002542

Report Date: 04/03/2020

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Eric Gonzalez
District Attorney
Kings County